

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
HEIDI A. OJEDA
3 Assistant Federal Public Defender
Nevada State Bar No. 12223
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Heidi_Ojeda@fd.org

7 Attorney for Corey Wylie Brown

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 COREY WYLIE BROWN,

15 Defendant.
16
17

Case No. 2:18-cr-089-RFB-VCF

**STIPULATION TO CONTINUE
EVIDENTIARY HEARING (Third
Request).
AND FIRST REQUEST TO EXTEND
GOVERNMENT'S RESPONSE
DEADLINE TO MOTION FOR
RECONSIDERATION (ECF 132)**

18 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
19 Acting United States Attorney, and Christopher Burton, Assistant United States Attorney,
20 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
21 and Heidi A. Ojeda, Assistant Federal Public Defender, counsel for Corey Wylie Brown, that
22 the Evidentiary Hearing currently scheduled on April 13, 2021, be vacated and continued to a
23 date and time convenient to the Court, but no sooner than sixty (60) days. Also, counselors
24 request that the due date for the Government's Response to Motion for Reconsideration of
25 Ruling Limiting Expert Testimony (ECF No. 132), currently due on April 7, 2021 be
26 continued to a date and time convenient to the Court, but no sooner than sixty (60) days.

1 This Stipulation is entered into for the following reasons:

- 2 1. The government has extended an offer to Mr. Brown. The defense needs
3 additional time to consider the offer and negotiate any possible settlement in this matter.
4 2. Mr. Brown is not incarcerated and agrees to the continuance.
5 3. The parties agree to the continuance.
6 4. Additionally, denial of this request for continuance could result in a
7 miscarriage of justice. The additional time requested by this Stipulation is excludable in
8 computing the time within which the trial herein must commence pursuant to the Speedy Trial
9 Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title
10 18, United States Code, Sections 3161(h)(7)(B)(i), (iv) and 18 U.S.C. 3161(h)(1)(D).

11 This is the third request for continuance filed herein.

12 DATED this 7th day of April 2021.

13
14 RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

15
16 By /s/ Heidi A. Ojeda

By /s/ Christopher Burton

17 HEIDI A. OJEDA
Assistant Federal Public Defender

CHRISTOPHER BURTON
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 COREY WYLIE BROWN,

7 Defendant.
8

Case No. 2:18-cr-089-RFB-VCF

ORDER

9
10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Evidentiary Hearing currently scheduled on
12 April 13, 2021 at the hour of 9:00 a.m., be vacated and continued to June 22, 2021 at
13 the hour of 9 : 00 a.m. And that the Government's deadline to file the Response to Motion
14 for Reconsideration of Ruling Limiting Expert Testimony (ECF No. 132), currently due on
15 April 7, 2021 is extended to June 15, 2021.

16 DATED this 7th day of April 2021.

17
18 

19 RICHARD F. BOULWARE, II
20 UNITED STATES DISTRICT JUDGE
21
22
23
24
25
26